

**(3) Interconnection that is Equal
in Quality**

ILECs should provide interconnections equal in quality to those they use themselves or provide to affiliates or to any other carrier. If it is technically infeasible to do so, they should provide interconnections that are equivalent in quality, from the perspective of both the requesting carrier and its customers, to the interconnections they provide to themselves or other parties. And in the event interconnections of equal quality cannot be provided, the charges should appropriately reflect the lesser quality of interconnection.

Beyond these general principles, the "equal in quality" mandate cannot be fully satisfied unless or until the ILECs provide seamless mainframe-to-mainframe interfaces -- "electronic bonding" -- to their back-office systems. In concept, this electronic bonding is much like the Customer Account Record Exchange ("CARE") system used by LECs and IXC's to exchange subscriber account information electronically. However, in order to facilitate local competition and guarantee interconnection of equal quality, electronic bonding must reach far beyond the existing CARE process and must include other operational support systems such as ordering and provisioning, trouble reporting and fault management, performance monitoring, network/traffic management, facility

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assignment and control, and other functions necessary to ensure that interconnected carriers are unimpeded in their ability to provide seamless service to their customers, and to provide the same level of service quality as the ILECs with whom they are interconnected.

Without electronic bonding, new entrants that depend (as they are entitled to) on the facilities of incumbent LECs would inevitably be at a serious disadvantage if ILECs have superior access to the systems used for receiving trouble reports, detecting and repairing service problems, taking service orders, assigning facilities and controlling facilities. For the seamless provision of service to customers which the public interest requires, and access to the ILECs' networks on a nondiscriminatory and equal-in-quality basis, as required in §251(c), electronic bonding must be implemented as soon as possible. At the same time, ILECs (and CLECs) must ensure that their systems fully comply with §222 so that proprietary information received from a competitor cannot be used for marketing purposes.

Sprint proposes that the Commission direct the industry to develop agreed-upon standards for electronic bonding within 12 months, and implementation of electronic bonding by ILECs in accordance with these standards within 12 months

thereafter.⁵ Until such implementation occurs, the Commission should not regard the duties imposed on ILECs by §251(c)(2)(C) to have been fully met.

**(4) Relationship Between Interconnection
and Other Obligations Under the 1996
Act**

Sprint agrees with the Commission's tentative conclusion (§64) that it has the authority to require physical collocation, virtual collocation and meetpoint interconnection arrangements, as well as any other reasonable method of interconnection (e.g., the use of an entrance facility). Clearly, physical collocation is the most "invasive" form of collocation that can be required. It is only logical to infer that the power to require this form of interconnection -- explicitly conferred in §252(c)(6) -- carries with it the power to require less invasive forms of interconnection as well.

b. Collocation

In §71, the Commission tentatively concludes that the premises at which physical collocation can take place under §251(c)(6) include central offices, tandem offices and all buildings or similar structures owned or leased by the ILEC

⁵ The Electronic Communications Implementation Committee (ECIC), a Working Committee under the Telecommunications Industry Forum (TCIF) of the Alliance for Telecommunications Industry Solutions (ATIS), has made some progress in developing guidelines and resolving technical and operational issues for implementation of electronic bonding.

that house its network facilities, and seeks comment on whether additional structures on public rights of way, such as vaults containing loop concentrators, should also be deemed to be ILEC premises. The Commission further seeks comment (§72) on what types of equipment ILECs must allow to be located on their premises.

The physical collocation mandate in §251(c)(6) relates to "equipment necessary for interconnection or access to unbundled network elements... ." Sprint views the function of §(c)(6) as giving the Commission the power to order physical collocation that may be necessary to effectuate points of interconnection and access to unbundled network elements under §§(c)(2) and (3), rather than having an independent purpose of its own. Accordingly, the definition of "premises" should be a function of, and not defined independently of, the points of interconnection and access to network elements deemed to be "technically feasible" under §§(c)(2) and (3). Given Sprint's position on points of interconnection, above, it clearly would be reasonable to define end office and tandem switch locations as premises. However, whether interconnection and access to requested network elements are technically feasible might depend in part on whether it is possible to accommodate the necessary equipment of the requesting carrier at such points.

The types of equipment the ILEC must accommodate, likewise, are a function of the point of interconnection or

access to unbundled elements. Paragraph (c)(6) mandates collocation only of "necessary" equipment. In the case of collocation at a switch location, this would limit the mandated equipment to channel terminating equipment.

Sprint agrees with the suggestion (§73) that the Commission adopt, as comprehensive national standards for collocation, its prior standards governing physical and virtual collocation established in CC Docket No. 91-141.⁶ The decisions in that docket were based on a full record, and there is no reason to re-invent that wheel. Likewise, Sprint agrees with the Commission's tentative conclusion (§79) that pursuant to §§201 and 251(g), its existing expanded interconnection policies should continue to apply.

c. Unbundled Network Elements

Sprint concurs in the Commission's tentative conclusions (§77) that it is obligated to identify network elements that LECs should make available on an unbundled basis under §251(c)(3) and that it should, at this time, identify a minimum set of network elements that ILECs must unbundle. Within the abbreviated time allowed for this proceeding, it would be impossible to definitively exhaust the possible universe of unbundled elements. Rather, negotiations, state commission actions, and subsequent amendment of these rules

⁶ However, collocation must be priced in accordance with §252(d)(1).

can be used to further expand the list of unbundled elements, as may be appropriate.

In cases where additional unbundled network elements beyond the minimum set are requested, the full panoply of procedures and presumptions discussed in Point II.B.2.a(1), above, should apply. Sprint sees no need at this time to lay out explicit provisioning and service intervals, technical standards and other safeguards to guard against discrimination (cf. ¶79). However, as with interconnection (Point II.B.2.a(3), above), electronic bonding must be required to permit seamless, efficient, and nondiscriminatory access to unbundled network elements.

(1) Network Elements

Sprint submits that the plain language of §§ 3(29) and 251(c)(3) compels the conclusion that purchase of a network element from an ILEC entitles the purchasing carrier to provide the consumer with all services that use that element (cf. ¶84). Network elements, by definition, are not dependent on particular services, and may be used for any service. Thus, for example, a carrier purchasing an unbundled loop and local switching to a particular end user would provide the origination and termination of all local and long distance calls to that customer on those facilities, and would be

entitled to any access revenues or reciprocal compensation payments that might be applicable from another carrier.⁷

The Commission also asked for comment (in ¶85) on the relationship between the unbundled network elements provision in §251(c)(3) and the resale provision in §251(c)(4). In Sprint's view, unbundled network elements should be defined not to include services offered at retail to customers that are not telecommunications carriers (such as custom calling features). However, a purchaser of unbundled network elements (e.g., the loop and local switching), could also buy the retail service feature (e.g., call waiting or call forwarding) at the wholesale rate specified in §251(c)(4) and combine it with the unbundled elements in order to provide services to the end user.

As indicated in the Introduction (Point I.), above, it is Sprint's view that the purpose of the 1996 Act was to foster local competition and that true competition is facilities-based competition. Resale and unbundling of network elements, while useful competitive tools in and of themselves, must also be viewed as means towards the ultimate end of facilities-based competition.

Resale provides an avenue for new entrants to acquire customers in the simplest possible way, without having to

⁷ The consumer could, of course, order a second loop from another carrier for other services.

construct any of their own network facilities, or without having to face the complexities of combining unbundled network elements into an end-to-end service package. This reduces the risk of facilities-based entry: the entrant can determine, without any significant investment of its own, whether entry is viable (i.e., whether it can win any customers), and the entrant can build up a revenue stream to more quickly cover its investment when it does build its own facilities. Furthermore, since the §251(c)(4) resale obligation of ILECs applies to "any" telecommunications service that the ILEC provides at retail, it ensures that new entrants will not only be able to provide basic services on a resale basis, but also will be able to match the product set of the incumbent.

Providing service through unbundled network elements is a more advanced stepping stone to facilities-based competition. As the Commission observed in ¶75, unbundling "allows new entrants to enter the LEC's market gradually, building their own networks over time, and purchasing fewer unbundled elements as their own networks develop." The need for an unbundling requirement derives from the fact that components of the ILECs' networks are not, generally speaking, available on a piecemeal basis, but are part of a service package. Unbundling the network elements facilitates entry "by ensuring that new entrants wishing to compete with incumbent LECs can purchase access to those network elements that they do not

possess, without paying for elements that they do not require" (id., footnote omitted).

Sprint believes that the unbundling requirement must be read in relationship to the resale requirement. Resale gives new entrants access to the entire array of service capabilities of the ILEC. Unbundling, on the other hand, comes into play in those circumstances where it is technically feasible to substitute the new entrant's facilities or equipment for those of the incumbent. Nothing in the Act suggests that retail services should also be considered network elements. Thus, §251(c)(3) requires ILECs to provide "access... at any technically feasible point," and §3(29) defines "network element" as "a facility or equipment" used in providing a telecommunications service, but not the services themselves. Although §3(29) defines "network element" also to include "features, functions and capabilities, the examples of such capabilities it gives ("subscriber numbers, databases, signaling systems, [etc.]"), are not service features that are offered on a retail basis to consumers. Furthermore, if retail service features were also made available to carriers as network elements, it would be blatantly discriminatory to charge different rates (outside of the wholesale discount available to resellers) to the two different groups.

For these reasons, Sprint does not believe that unbundled network elements should be defined so as to include service

features offered on a retail basis to consumers. However, as indicated above, a purchaser of unbundled elements should be entitled to also purchase retail service features (such as custom calling features, which are discussed in more detail in Point II.B.2.c.(3)(b), below) and combine them with the unbundled network elements to offer a full range of service features to its customers.

The Commission further requested comment (§85) on the implications of the difference in pricing standards as between unbundled network elements and services available for resale. Nothing in §(c)(3) puts any restriction or constraints on requesting carriers that want to purchase network elements on an unbundled basis. On the contrary, the provision makes clear that such element must be provided "in a manner that allows requesting carriers to combine such elements in order to provide such telecommunications service." Thus, if a carrier wished to, it could purchase from the ILEC, on an unbundled basis, all of the network elements needed to provide local exchange and exchange access service to a particular end user, at prices consistent with the costing standards of §252(d)(1).

These prices will invariably add up to a different total than the wholesale price, determined under §252(d)(3). If retail prices have been set by state regulatory authorities at below-cost levels, the wholesale rate for retail service might

(at least in the near term) be less than the sum of the rates for all of the unbundled network elements needed to provide local service to the customer; however, a carrier choosing to buy unbundled network elements takes responsibility for putting those together to form a package of service to the consumer, and would also be entitled to any access revenues that may be generated by the customer. On the other hand, if retail rates for local business service have been set above costs, the sum of the network element prices might be less than the wholesale rate.

Having such an "alternative way to 'resell' the services of incumbent LECs" does not strike Sprint as anomalous in any sense. The central purpose of Part II of Title II is to encourage competition in all common carrier markets, particularly those that have been closed in the past. See ¶¶1-12. In this regard, President Clinton, in signing the 1996 Act, pointed to the "strong emphasis on competition in both local and long distance telephone markets" and "interconnection arrangements to permit vigorous competition."⁸ Given the clear intent of the Act, it is not surprising that Congress provided multiple means for new entrants to break into the local monopoly. Furthermore, the opportunities for arbitrage created by the availability of

⁸ Weekly Compilation of Presidential Documents, 12 February 1996, Vol. 32, No. 6, p. 219.

both the "resale" and the "unbundled network elements" options provides a critically important procompetitive incentive to rationalize pricing for the various services provided by incumbent LECs, an issue that is discussed in more detail at Point II.B.2.d(3)(c), below.

(2) Access to Network Elements

Sprint agrees with the Commission's tentative conclusion (¶87) that ILECs should have the burden of proving that the provision of a requested network element is technically infeasible. As in the case of interconnection (see Point II.B.2.a(1), above), the rules should incorporate the following guidelines: (1) the carrier requesting any additional unbundling is obligated to define the unbundled network element with sufficient detail (e.g., the facility, equipment, feature, function or capability requested) to permit meaningful evaluation by the ILEC; (2) the ILEC has the burden of proof to show that providing a requested unbundled network element is not technically feasible; (3) once an unbundled network element is made available by any ILEC, it should be presumed that it is technically feasible for other ILECs, using like technology, also to provide such element. If an ILEC claims that provision of an unbundled network element is not technically feasible, it should be required to:

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- Offer economical alternatives to the network element that the ILEC believes is not technically feasible.⁹
- Describe how the requested network element's functions are accomplished within the ILEC's own network.
- Explain why the ILEC's own network element's functions cannot be used for the requested interconnection.
- Undertake studies and analyses to assess the the technical feasibility of providing the requested network element, and provide all such studies and analyses.
- Provide all other relevant information and documents that the ILEC relied upon to conclude that providing the requested network element was not technically feasible.

In answer to the question posed in ¶88, Sprint submits that the absence of the term "economically reasonable" in §251(c)(3) compels the conclusion that an ILEC should not be permitted to refuse to provide a network element simply because it believes that it is not economically feasible to do so.¹⁰ Section 252(d)(1) guarantees reasonable cost recovery to the ILEC, and whether purchase of a particular element at cost-based rates is economic is the choice of the requesting carrier. Again, as in the case of interconnection, where there are substantial fixed costs involved in providing a

⁹ The ILEC should be required to offer such alternatives at the time that the ILEC tells the requesting carrier that providing the requested element is not technically feasible.

¹⁰ When the ILECs, through USTA, sought to include economic feasibility as a prerequisite for interconnection, Congress rejected the effort.

particular network element, the Commission's rules should contemplate that the ILEC's agreements with other carriers would address the option of subsequent price decreases if additional telecommunications carriers later purchase the same network element, to avoid burdening the first carrier requesting the network element with all fixed costs.

It may be appropriate to vary the required facilities or services associated with a particular network element, depending on the service for which the requesting carrier wishes to use the network element (see ¶90). Thus, a loop intended to be used only for low speed data or voice need not have the same conditioning that a loop used for higher speed transmissions would require. However, once the requesting carrier specifies the network element it needs, it is entitled to use that element for any service it wishes to provide.

(3) Specific Unbundling Proposals

(a) Local Loops

Sprint agrees that local loops should be provided as unbundled elements.¹¹ In ¶97, the Commission tentatively concludes that it should require further unbundling of the loop, possibly by unbundling loop feeder plant, loop

¹¹ The loop should be defined as a channel from the requesting carrier's or end user's premises to the host office in the same exchange, or to the remote switch if there is no host switch in the end user's exchange.

distribution plant and remote switching or concentration equipment. Sub-loop unbundling is technically feasible in many circumstances. However, such unbundling raises sufficient administrative questions for the ILEC, with cost consequences for the requesting carrier, discussed below, that Sprint does not favor a blanket requirement for sub-loop unbundling at this time. Instead, no ILEC should be required to unbundle at the sub-loop level until there is a commercial demand for such unbundling in the form of a bona fide request.

It is not clear to Sprint that such further unbundling of the loop is necessary for a competitive LEC to offer services to end users in an efficient manner. Furthermore, such unbundling would introduce so many additional points of interconnection in the network that it would be very complicated administratively to track the sub-elements, to bill for sub-loop elements, and to cost them out for pricing purposes. Sub-loop unbundling would also require dispatching personnel and additional equipment to the sub-loop interfaces with other carriers and would complicate remote testing. While, as will be discussed below, Sprint believes that the pricing structure for unbundled loops should be relatively simple, with prices varying only by geographic zone and consisting of either a flat charge or perhaps a combination of flat charge and distance-sensitive charge, the charges for sub-loop elements might require a much more complex rate

structure that would reflect the different sizes of feeder cable, concentrating equipment or remote switching equipment that are employed in the local networks. The additional administrative costs occasioned by sub-loop unbundling would result in higher charges, for the sum of the sub-loop components, than the charge for a bundled loop. Thus, unbundled sub-loop elements may not be all that attractive to CLECs (although the economic desirability of such unbundling is a matter for the CLEC, not the ILEC, to decide).

Accordingly, rather than require all ILECs to further unbundle their loops ab initio, Sprint believes the better course of action would be to leave sub-loop unbundling to the process, described above, for requesting additional elements. Applying this procedure to sub-loop unbundling could save considerable time and administrative expense in allowing the initial interconnection arrangements between CLECs and ILECs to proceed, and yet would guarantee the availability of components of the loop on an unbundled basis if such components are demanded by the CLEC, if their unbundling is technically feasible, and if their price is commercially attractive to the CLEC.

(b) Local Switching Capability

In ¶¶98-102, the Commission tentatively concludes that unbundled local switching capabilities should be a network

element -- a conclusion with which Sprint agrees -- and asks how to define the switching capabilities.

As a threshold matter, the Commission must recognize that local switching cannot technically be "unbundled" in the same manner as a local loop. In the case of the latter, the purchaser obtains a dedicated facility or channel which, from a service standpoint, is separable from, and can be used independently of, the incumbent LEC's network. The discrete nature of the unbundled loop enables new entrants to utilize that facility to create or provision any service compatible within the technical capabilities of that facility.

In the case of local switching, the term "unbundling" is something of a misnomer, to the extent that unbundling implies the physical or technical separability of switching functionality between entities utilizing the switch. Although some portions of the switch (for instance, the line card) can in fact be technically unbundled, the preponderance of the switch is a shared resource which cannot be physically partitioned into discrete components dedicated to the use of a purchaser. Unavoidably, the central processing unit, the operating and applications software, and the switch matrix itself are switch functions shared between the incumbent LEC and all new entrants utilizing that switch. In the case of local switching, the term "unbundling" (at least from a technical, not a pricing, standpoint) is primarily an issue of

providing new entrants' access to shared switching functionalities rather than providing dedicated equipment or facilities.¹²

Consequently, the local switching network element has to be defined not in terms of equipment or facilities but in terms of access to switch functionalities or capabilities. In this context, Sprint proposes that basic local switching capacity, (i.e., the ability to switch calls from one line to another or from a line to a trunk) be defined as a network element. This element would include the line card as well as the switching capacity utilized by the purchaser of the unbundled local switching.

Sprint believes that switching should be priced on a capacity basis. The costs of the usage sensitive components of the switch are driven by peak busy hour usage. The new entrants' customer bases may -- and probably will -- have markedly different usage characteristics than the average customer of the incumbent; therefore, as a matter of economic efficiency (and thus as a matter of competitive equity), it is

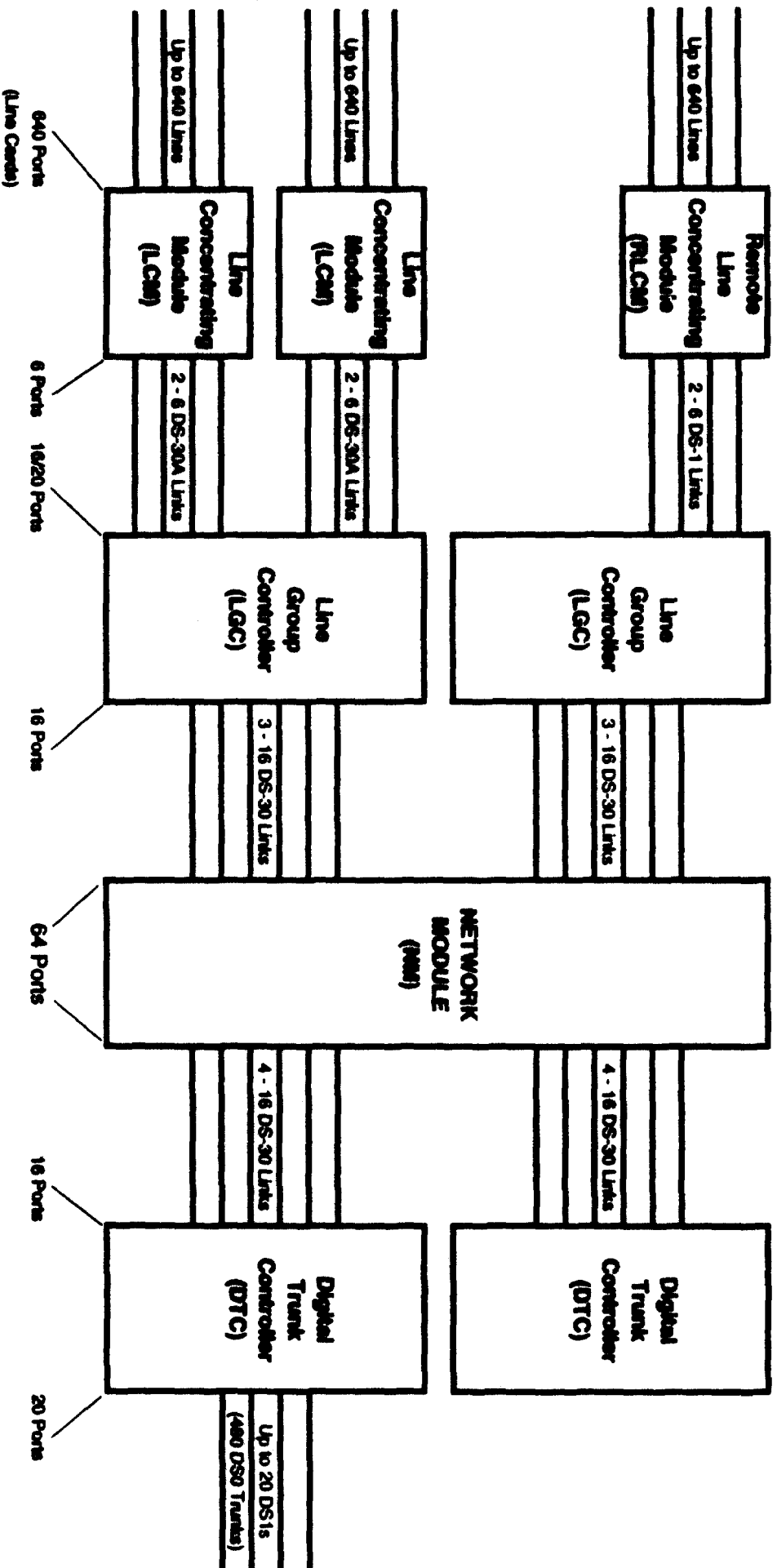
¹² With existing technology, purchasers of unbundled switching will have limited, if any, flexibility to customize their switching functionality. For example, in many switches it is not feasible to provision both seven digit (local) and ten digit (toll) routing to the same NXX. The import of this is that the new entrant would, in buying unbundled switching, be constrained to the same dialing pattern as the incumbent LEC. Sprint is initiating efforts to work with its switch vendors to identify, and overcome to the extent possible, all such potential limitations on the use of its switching capabilities by new entrants.

important that purchasers of unbundled local switching be charged rates that reflect the costs they cause to be incurred. Under Sprint's proposal, each purchaser of unbundled local switching would have dedicated access to the first point of concentration in the switch, and would order and pay for the number of links necessary to provide switching capacity at its desired grade of service.¹³ Thus, each new entrant utilizing the incumbent's switching capacity would pay only for the costs it actually imposes on the network.

In addition, provisioning access to switching capacity in this manner avoids any potential that new entrants could adversely affect the quality of service provided by the incumbent LEC, or vice versa. For example, if the subscriber lines of both the incumbent LEC and purchasers of unbundled switching were interconnected into the same line concentration equipment, any provider (LEC or new entrant) that

¹³ The first point of concentration is the point where the individual customer lines are terminated into circuit equipment. The links between this termination equipment and the switch are sized to handle the (peak) demand of the customers who are served out of that concentration equipment. For example, in Nortel's DMS switch, which is illustrated in the diagram on the following page, the Line Concentration Module (LCM) can handle up to 640 subscriber lines. The LCM is connected to the Line Group Controller by from two to six links (60-180 channels), depending on the demand characteristics of the subscribers connected to that LCM. The number of links actually ordered by a new entrant would thus determine the amount of switching capacity that would be made available to its customers, and the amount of capacity for which it should be charged.

SIMPLIFIED DIAGRAM OF DMS-100 SWITCH



underforecasts the amount of switching capacity it needs to serve its customers could adversely affect the quality of service of all customers of all carriers using that switch. Separating each carrier's access to the switch at the first point of concentration would ensure that any service degradation resulting from a carrier's ordering too few access links into the switch would affect only that carrier's customers.

As the Commission points out (¶99), the current generation of switching technology is capable of providing functions in addition to basic switching. While Sprint believes that resellers and purchasers of unbundled basic switching should have the ability to provide these features to their end user customers, Sprint does not believe it necessary or appropriate to treat these functionalities as network elements.

Most, if not all, of the advanced features that a new entrant would want are already unbundled and provided at retail.¹⁴ These include services such as custom calling features, Centrex features and functions available to end users, as well as functionalities, such as SMDI (Station Message Desk Interface), provided to other service providers.

¹⁴ To the extent that CLECs require access to functionalities not provided by the ILEC, the ILEC should, of course, be required to provide access to that functionality.

Sprint's proposal regarding the treatment of advanced switch functionalities is also premised on the fact that these functionalities cannot be unbundled in a strictly technical sense. For instance, custom calling features, either individually or collectively, are not provided through discrete and separable pieces of equipment (although separate add-on equipment, in addition to the switching functionalities described below, might be required for some advanced features such as three-way calling). Rather, their functionality is embedded in both the switch software and the operation of the switch itself (e.g., features are invoked by the central processing unit each time a call is set up).¹⁵ At least in terms of existing switch technology, the only access to advanced switching functionalities that is technically feasible to provide is access to the service functionality -- that is, what is already being provided in the existing tariffs.

With respect to the "local switching platform" LDDS Worldcom has proposed in Illinois (§100), Sprint is unclear as to the specific nature of the requested platform. It appears that LDDS is requesting a block of switching capacity to

¹⁵ The fact that these functionalities are technically inseparable from the switch does not mean that the costs of these features cannot be identified. In particular, it would be critical, in the development of rates for the unbundled local switching element, to exclude all costs associated with advanced switching functionalities.

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provide local exchange and exchange access services, including all vertical features (e.g. custom calling features, CLASS, etc.). However, it is unclear whether this is capacity in the switching matrix, the line modules, the trunk modules, the central processor, the switch memory, any adjunct devices, other network components, or some combination. It is equally unclear how the capacity would be measured -- total traffic per month, CCS at the busy hour, port capacity, memory units, or some other measure. Without these details and others, Sprint cannot determine what ILECs would be selling to LDDS.

LDDS requests access to calling features, but somehow sees this as different from buying calling features as a wholesale service under the Act. As Sprint stated above (Point II.B.2.c(1)), Sprint believes that service features offered separately at retail are not "network elements" that must be unbundled.

As stated earlier, Sprint believes that while resale is important to the development of competition, true competition in the local market will occur only when there is facilities-based competition. In that regard, the local switching platform does not create incentives to build facilities and compete in access markets. It appears to be nothing more than a different way of pricing at wholesale for the LEC's retail services, i.e., LDDS would get exactly the same functionality and service under the platform concept as it would if it

simply resold a LEC's retail service. Given the lack of sufficient detail on LDDS' local switching platform concept and lack of incentive for facilities-based competition, Sprint recommends that the Commission not adopt the platform concept.

Finally with respect to switching, the Commission asks (§103) for comment on whether the requirements governing local switching elements could be tailored to apply to a tandem switching element. Tandem switching is essentially trunk-to-trunk connections, and, unlike local switching, does not directly connect to subscriber lines. The costs of tandem switching are a function of peak or busy hour usage, and thereby lend themselves to a capacity-based rate, as previously discussed.

(c) Local Transport and Special Access

Transport, of course, must be offered on an unbundled basis. Sprint supports the Commission's tentative conclusion (§105) that the existing structure of switched transport and special access rate elements (including the availability of common transport on a per-minute basis) should be the basis for the unbundled elements.

(d) Data Bases and Signaling Systems

Sprint supports the unbundling of signaling systems and database functions, as proposed in §107. The SS7 network is an enabling technology that performs essential network

functions. Because of the critical nature of the SS7 functionality, care must be taken to protect the survivability of the interconnected networks. Sprint believes today's SS7 network did not contemplate interconnection other than at Switch Transfer Points (STPs). If other points of interconnection are proposed, standards should be written which address additional points of ingress and egress.

On an unbundled basis, Sprint's local telephone division currently provides access to the SS7 network either through "A" links, which generally connect an end office to the STP, or "B" or bridge links which connect two distinct SS7 networks utilizing STPs in each network. In addition, database services provided via the SS7 transport network, such as Line Information Database (LIDB) and the Toll Free Calling (TFC) databases (800/888), are available today as tariffed services, and access to the calling name database is available through contracts from the various database owners. Access to the reservation of TFC numbers and the activation process is available today as an unbundled tariff offering from many common carriers and independent suppliers through the RESP ORG process. Nonrecurring charges should be utilized for the unbundled signaling functions such as global title translation tables, point code screening tables and other logical tables to accommodate the new entrants' needs on an equal basis to